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Attorneys for Plaintiff JULIO ROCHA

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

JULIO ROCHA,

Plaintiff,

v.

CERTAIN UNDERWRITERS AT LLOYD'S,
LONDON; AXIS SPECIALTY EUROPE SE,

Defendants.

Civil Action No.: **1:16-CV-02327 RJD-RML**

**DECLARATION OF ALEXANDER D.
HARDIMAN IN SUPPORT OF
PLAINTIFF JULIO ROCHA'S MOTION
FOR PRELIMINARY INJUNCTION**

I, ALEXANDER D. HARDIMAN, being duly sworn, deposes and says:

1. I am a partner in the law firm of Pillsbury Winthrop Shaw Pittman LLP, counsel for Plaintiff Julio Rocha. I submit this Declaration in Support of Plaintiff Julio Rocha's Motion for Preliminary Injunction Requiring Defendants to Pay Defense Costs.

2. Attached hereto as **Exhibit A** is a true and complete copy of this Court's April 27, 2016 Memorandum & Order in the related case of Eduardo Li v. Certain Underwriters at Lloyd's, London, et al., Case No. 15-CV-06099 (RJD).

3. Attached hereto as **Exhibit B** is a true and complete copy of the Directors and Officers Legal Liability Policy No. L1413318 sold by Defendants to Federation

Internationale de Football Association ("FIFA"), effective December 30, 2014 to December 30, 2015.

4. Attached hereto as **Exhibit C** is a true and complete copy of the May 20, 2015 Indictment filed against fourteen individual defendants, including Julio Rocha.

5. Attached hereto as **Exhibit D** is a true and complete copy of the Victim Statement and Request for Restitution filed by FIFA against individual defendants, including Julio Rocha, filed on or about March 15, 2016 in connection with the Indictment.

6. Attached hereto as **Exhibit E** is a November 24, 2015 letter from Mr. Rocha's U.S. coverage counsel to Gary Mann.

7. Attached hereto as **Exhibit F** is a December 16, 2015 letter from Defendants regarding Mr. Rocha's insurance claim to Mr. Rocha's U.S. coverage counsel.

8. Attached hereto as **Exhibit G** is a March 30, 2016 letter from Mr. Rocha's U.S. coverage counsel to Erik Stenberg.

Dated: May 25, 2016

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Alex D. Hardiman", written over a horizontal line.

Alexander D. Hardiman